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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

**IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION**

MDL No. 3047

Case No. 4:22-md-03047-YGR

This Document Relates to:

ALL NON-BELLWETHER SCHOOL DISTRICT
CASES

**[PROPOSED] STIPULATION AND
ORDER RE: LOCAL GOVERNMENT
AND SCHOOL DISTRICT
BELLWETHER PLAINTIFFS’
SUPPLEMENTAL INITIAL
DISCLOSURE STATEMENT
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 26(A)(1)(A)(iii)**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

WHEREAS, after hearing arguments from both sides at a Discovery Management Conference on September 12, 2024 (“DMC”), the Court ordered that the Non-Bellwether Local Government and School District Plaintiffs (“Non-BW LGE/SDs”) begin a rolling production on February 10, 2025 of supplemental Rule 26(a)(1)(A)(iii) disclosures of past property damages and past increased hiring costs (Tr. at 41:2).

WHEREAS, the parties, having met and conferred following the DMC, hereby stipulate to the following rolling production of supplemental Rule 26(a)(1)(A)(iii) disclosures of past property damages and past increased hiring costs by the Non-BW LGE/SDs whose cases are on file as of the date of the entry of this Order.¹

¹ Plaintiffs’ Reservations: Continuing investigation and discovery may cause the Non-BW LGE/SD Plaintiffs to become aware of additional evidence or information that is relevant to these initial

WHEREFORE the Court Orders the following rolling production schedule of supplemental Rule 26(a)(1)(A)(iii) disclosures of past property damages and past increased hiring costs by the Non-BW LGE/SDs:

DATE	
February 10, 2025	Non-BW LGE/SDs on Exhibit A
March 12, 2025	Non-BW LGE/SDs on Exhibit B
April 11, 2025	Non-BW LGE/SDs on Exhibit C
May 12, 2025	Non-BW LGE/SDs on Exhibit D

WHEREFORE, the Court further Orders that the supplemental Rule 26(a)(1)(A)(iii) disclosures shall be filed through MDL Centrality.

IT IS SO ORDERED.

DATED:

MAGISTRATE JUDGE: HON. PETER H. KANG

disclosures. The Non-BW LGE/SD Plaintiffs have sustained past, ongoing, and future damages. As such, the estimated approximate property damages and increased hiring costs only reflect a portion of the total damages the Non-BW LGE/SD Plaintiffs seek in this litigation. The Non-BW LGE/SDs specifically reserve all rights to amend and supplement including reserve their right to serve expert reports and/or amended disclosures which reflect different property and increased hiring costs and/or total damages numbers than those provided herein based on additional information and/or expert analysis. The Non-BW LGE/SD Plaintiffs expressly reserve the right to supplement and/or amend their supplemental disclosures, to the extent such supplementation or amendment may be required by the Federal Rules of Civil Procedure and/or based on additional information and/or expert analysis. Non-BW LGE/SD Plaintiffs hereby expressly reserve all objections to the use, for any purpose, of these initial disclosures, or any of the information referenced in their supplemental disclosures, in this consolidated action or any other proceeding. The Non-BW LGE/SD Plaintiffs incorporate by reference their Plaintiff Fact Sheets and Supplemental Plaintiff Fact Sheets, and amendments thereto. The Non-SD BW Plaintiffs expressly object to producing or making available for inspection and copying, as under Rule 34, any documents or other evidentiary material created or collected through this process that constitutes work product or which implicates the attorney-client privilege.

1 Dated: September 27, 2024

Respectfully submitted,

2 /s/ Lexi J. Hazam

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L.R. 5-1 ATTESTATION

I, Geoffrey M. Drake, attest that all signatories listed herein, and on whose behalf this filing is submitted, concur in this filing's content and have authorized this filing.

By: /s/ Geoffrey M. Drake
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